

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 24-cr-50-JDP

STEVEN ANDEREGG,

Defendant.

FIRST PRETRIAL MOTION: MOTION TO SUPPRESS

Steven Anderegg, by counsel, moves to suppress the evidence gathered pursuant to search warrants issued in this case. As argued in the omnibus brief in support of the pretrial motions, the search warrant should not have issued for two interrelated reasons.

First, the search-warrant application was not particularized enough in its description of its images for a reasonable person to believe that the images constituted obscene material.

Second, the search warrant application relied entirely on the officer's description of the images and did not provide the issuing judge the images themselves, so the judge could (for himself) determine whether they meet the high threshold for obscene material.

For the reasons expressed in the omnibus brief in support of the pretrial motions, the defense requests that the search warrants be quashed and the evidence gathered pursuant to them be suppressed.

Dated this 23rd day of September, 2024.

Respectfully submitted,

STEVEN ANDEREGG, *Defendant*

Electronically signed by Joseph A. Bugni

Joseph A. Bugni

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